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5 Attorneys for Appellant
Cyprus Bagdad Copper Corporation

6
7 STATE LAND DEPARTMENT OF THE STATE OF ARIZONA
8 BEFORE THE BOARD OF APPEALS

9
10 IN THE MATTER OF APPEAL OF
APPRaisal OF APPLICATION TO
PURCHASE GROUNDWATER NO. 21-102152
11 IN THE AMOUNT OF \$85 PER ACRE-FOOT,
WITH A MINIMUM ANNUAL REMOVAL OF
12 80 ACRE-FEET FOR A TOTAL MINIMUM
ANNUAL ROYALTY OF \$6,800 FOR A TERM
13 OF TEN YEARS ON STATE LAND
DESCRIBED AS:

A.B. NO. 997

14 SECTION 17, TOWNSHIP 13 NORTH,
15 RANGE 9 WEST, YAVAPAI COUNTY,
ARIZONA

16
17 IN THE MATTER OF APPEAL OF
APPRaisal OF APPLICATION TO
PURCHASE GROUNDWATER NO. 21-102153
18 IN THE AMOUNT OF \$85 PER ACRE-FOOT,
WITH A MINIMUM ANNUAL REMOVAL OF
19 80 ACRE-FEET FOR A TOTAL MINIMUM
ANNUAL ROYALTY OF \$6,800 FOR A TERM
20 OF TEN YEARS ON STATE LAND
DESCRIBED AS:

A.B. NO. 998

21
22 SECTION 29, TOWNSHIP 14.5 NORTH,
RANGE 8 WEST, YAVAPAI COUNTY,
23 ARIZONA

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25
26

1 IN THE MATTER OF APPEAL OF
2 APPRAISAL OF APPLICATION TO
3 PURCHASE GROUNDWATER NO. 21-102154
4 IN THE AMOUNT OF \$85 PER ACRE-FOOT,
5 WITH A MINIMUM ANNUAL REMOVAL OF
6 80 ACRE-FEET FOR A TOTAL MINIMUM
7 ANNUAL ROYALTY OF \$6,800 FOR A TERM
8 OF TEN YEARS ON STATE LAND
9 DESCRIBED AS:

A.B. NO. 999

6 SECTION 1, TOWNSHIP 15 NORTH,
7 RANGE 9 WEST, YAVAPAI COUNTY,
8 ARIZONA

8 IN THE MATTER OF APPEAL OF
9 APPRAISAL OF APPLICATION TO
10 PURCHASE GROUNDWATER NO. 21-102155
11 IN THE AMOUNT OF \$85 PER ACRE-FOOT,
12 WITH A MINIMUM ANNUAL REMOVAL OF
13 80 ACRE-FEET FOR A TOTAL MINIMUM
14 ANNUAL ROYALTY OF \$6,800 FOR A TERM
15 OF TEN YEARS ON STATE LAND
16 DESCRIBED AS:

A.B. NO. 1000

13 SECTION 11, TOWNSHIP 15 NORTH,
14 RANGE 9 WEST, YAVAPAI COUNTY,
15 ARIZONA

16 IN THE MATTER OF APPEAL OF
17 APPRAISAL OF APPLICATION TO
18 PURCHASE GROUNDWATER NO. 21-102156
19 IN THE AMOUNT OF \$85 PER ACRE-FOOT,
20 WITH A MINIMUM ANNUAL REMOVAL OF
21 80 ACRE-FEET FOR A TOTAL MINIMUM
22 ANNUAL ROYALTY OF \$6,800 FOR A TERM
23 OF TEN YEARS ON STATE LAND
24 DESCRIBED AS:

A.B. NO. 1001

21 SECTION 24, TOWNSHIP 15 NORTH,
22 RANGE 9 WEST, YAVAPAI COUNTY,
23 ARIZONA

23 APPELLANT: CYPRUS BAGDAD COPPER
24 CORP.

CYPRUS BAGDAD COPPER
CORPORATION'S RESPONSE
TO MOTION TO
CONSOLIDATE

25 Cyprus Bagdad Copper Corporation ("Cyprus Bagdad")
26 hereby responds to the State Land Department's Motion to

1 Consolidate. Cyprus Bagdad agrees that all of these appeals
2 should be heard in a single hearing for the convenience of the
3 Board and the parties. It does not agree that the Board, by
4 virtue of consolidation, should be obliged to assign the same
5 value to water under all of the applications. Cyprus Bagdad will
6 urge that each of the applications be evaluated independently in
7 light of the evidence presented.

8 DATED this 10th day of December, 1997.

9 FENNEMORE CRAIG, P.C.

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18 Copies of the foregoing mailed
19 this 10th day of December, 1997,
to:

20 J. Dennis Wells
21 State Land Commissioner
22 1616 West Adams Street
Phoenix, Arizona 85007

23 Terri M. Skladany
24 Assistant Attorney General
25 Solicitor General & Opinion Section
26 Office of the Attorney General
1275 West Washington Street
Phoenix, Arizona 85007-2926
Attorney for the Board

By 
Lauren J. Caster
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Bagdad Copper Corporation

1 Karen E. Baerst, Esq.
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3 1275 West Washington Street
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Phyllis J. Warren

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